

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Anita Butler	:	
	:	Chapter 13
	:	
Debtor	:	Case No.: 16-14484

MOTION TO RECONSIDER ORDER MODIFYING AUTOMATIC STAY

Comes Now Anita Butler, hereinafter referred to as "Debtor" and moves this Honorable Court to vacate its September 25, 2017 Order Modifying the Section 362 Automatic Stay and in support thereof avers the following:

1. The above-captioned bankruptcy matter was filed as a Chapter 13 on or about June 23, 2016.
2. The Chapter 13 bankruptcy matter was assigned case number 16-14484.
3. The Chapter 13 Plan was confirmed by this Honorable Court on February 22, 2017.
4. On or February 22, 2017 Lakeview Loan Servicing, LLC, as "Movant" filed a Motion for Relief from the Automatic Stay.
5. On or about June 5, 2017 the parties entered into a Stipulation resolving the delinquency at subject to the Motion for Relief.
6. In furtherance of the August 2, 2017 Notice of Default of the Stipulation on September 25, 2017 this Honorable Court entered an Order Modifying the Automatic Stay in favor of Lakeview Loan Servicing, LLC. A true and correct copy of the September 25, 2017 Order is attached hereto as **Exhibit "A."**
7. The Debtor avers that although she was in receipt of the Stipulation, she did not fully understand her obligations and failed to consult her counsel.

8. The Debtor is desirous of keeping the residence known as and located at 5237 Walton Avenue, Philadelphia, Pennsylvania.

9. To that end, the Debtor is determined to and is desirous of curing all post-petition delinquencies due and owing to the Movant prior to the scheduled hearing on the instant motion.

WHEREFORE, for the reasons stated herein, the Debtor respectfully requests that this Honorable Court Vacate its September 25, 2017 Order Modifying the Automatic Stay.

Dated: October 19, 2017

Respectfully submitted,

/s/ Brad J. Sadek, Esquire
Brad J. Sadek, Esquire
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